

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SANDRA ZARICHNY

Plaintiff,

v.

Case Number 2:14-cv-03197-SD

COMPLETE PAYMENT RECOVERY
SERVICES, INC. d/b/a CPRS d/b/a
www.paymentpost.com; FIDELITY NATIONAL
INFORMATION SERVICES d/b/a FIS d/b/a
www.paymentpost.com; and DOES 1 through 10,
inclusive

ELECTRONICALLY FILED

Defendants.

**OFFER OF JUDGMENT OF DEFENDANT
COMPLETE PAYMENT RECOVERY SERVICES, INC.**

To:

Arkady "Eric" Rayz, Esquire
KALIKHMAN & RAYZ, LLC
1051 County Line Road, Suite A
Huntingdon Valley, PA 19006

Gerald D. Wells, III, Esquire
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2200 Renaissance Blvd., Suite 308
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Attorneys for Plaintiff
Sandra Zarichny

Pursuant to Fed. R. Civ. P. 68, remaining defendant Complete Payment Recovery Services, Inc. ("CPRS") hereby offers to allow judgment to be taken against it with respect to plaintiff Sandra Zarichny's First Amended Complaint ("FAC"), which offer is made for the purposes specified in Rule 68 and is not to be construed as an admission of liability on the part of CPRS or that plaintiff Zarichny suffered any damages:

1. As to Count I of the FAC, in the amount of \$3,500 (\$1,000 under 15 U.S.C. § 1692k(a)(2)(A) and \$2,500 under 15 U.S.C. § 1692k(a)(3)), inclusive of the costs of the action and reasonable attorney's fees incurred through the date of the offer; and
2. As to Count II of the FAC, in the amount of \$5,500 under 47 U.S.C. § 227(b)(3)(B), inclusive of the costs of the action and reasonable attorney's fees incurred through the date of the offer.



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Complete Payment Recovery Services, Inc.

Dated: January 29, 2015